

EXHIBIT G

1 **LABATON SUCHAROW LLP**

2 THOMAS A. DUBBS (*pro hac vice*)
LOUIS GOTTLIEB (*pro hac vice*)
CAROL C. VILLEGRAS (*pro hac vice*)
JEFFREY A. DUBBIN (#287199)

3 JAMES L. OSTASZEWSKI (*pro hac vice*)

4 140 Broadway
New York, New York 10005

5 Telephone: (212) 907-0700

6 Facsimile: (212) 818-0477

7 Email: tdubbs@labaton.com

8 lgottlieb@labaton.com

9 cvillegas@labaton.com

10 jdubbin@labaton.com

11 jostaszewski@labaton.com

12 *Counsel for Lead Plaintiff the Public Employees Retirement
Association of New Mexico and Lead Counsel for the Class*

13 [Additional Counsel appear on signature page]

14 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

15 **IN RE PG&E CORPORATION
SECURITIES LITIGATION**

16 Civil Action No. 3:18-cv-03509-RS

17 ORDER

18 **STIPULATION TO AMEND AND LEAD
PLAINTIFF'S NOTICE OF WITHDRAWAL
OF MOTION**

1 WHEREAS, on November 9, 2018, Lead Plaintiff the Public Employees Retirement
 2 Association of New Mexico (“Lead Plaintiff”) in this Consolidated Action (as defined in the
 3 Consolidation Order) filed its Consolidated Class Action Complaint (ECF No. 83, the “CCAC”)
 4 pursuant to the schedule ordered by the Court (ECF No. 15);

5 WHEREAS, certain events occurred immediately prior to and/or after Lead Plaintiff filed
 6 the CCAC, including but not limited to a wildfire known as the “Camp Fire”;

7 WHEREAS, it is Lead Plaintiff’s position that certain factual developments, including
 8 facts related to the Camp Fire, give rise to claims similar in nature to those alleged in the CCAC;

9 WHEREAS, on November 19, 2018, counsel for Lead Plaintiff contacted counsel for
 10 Defendants PG&E Corporation and Pacific Gas and Electric Company (together, “PG&E”), and
 11 informed counsel for PG&E that: (1) Lead Plaintiff desired to amend the CCAC; (2) if
 12 Defendants in the Consolidated Action declined to stipulate to Lead Plaintiff’s filing of the
 13 proposed Second Amended Consolidated Class Action Complaint (the “SAC”), then Lead
 14 Plaintiff intended to file a motion seeking leave to amend the CCAC; and (3) if Lead Plaintiff’s
 15 motion for leave to amend were denied, then Lead Plaintiff intended to file a new lawsuit that
 16 would include the new allegations not currently alleged in the CCAC;

17 WHEREAS, on October 29, 2018, Lead Plaintiff filed a Notice of Motion and Motion to
 18 Partially Lift the PSLRA Discovery Stay (ECF No. 79);

19 WHEREAS, on November 13, 2018, PG&E and Individual Defendants Anthony F.
 20 Earley, Jr., Geisha J. Williams, Nickolas Stavropoulos, Julie M. Kane, Christopher P. Johns, and
 21 Patrick M. Hogan (collectively, “Defendants”) filed their Oppositions to Plaintiff’s Motion to
 22 Partially Lift the PSLRA Discovery Stay (ECF Nos. 84 & 85);

23 WHEREAS, Lead Plaintiff’s Reply in Support of its Motion to Partially Lift the PSLRA
 24 Discovery Stay is due on November 20, 2018; and

25

26

27

28

WHEREAS, Lead Plaintiff and Defendants agree that in the interests of efficiency and judicial economy, Lead Plaintiff may set out any new allegations in, and file, the SAC.¹

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, pursuant to Federal Rule of Civil Procedure 15(a)(2) and Civil Local Rule 7-7(e), that:

- 1) Lead Plaintiff hereby withdraws its Motion to Partially Lift the PSLRA Discovery Stay (ECF No. 79), and agrees that it will not file a similar motion in the future;
- 2) Defendants agree, with reservation of all rights, that Lead Plaintiff may file a Second Amended Consolidated Class Action Complaint (the “SAC”);
- 3) Lead Plaintiff will file its SAC on or before Friday, December 14, 2018;
- 4) Defendants shall have until February 15, 2019 to move, answer, or otherwise respond to the SAC, reserving all rights as to all defenses; and
- 5) In the event that Defendants file any motions directed at Lead Plaintiff’s SAC, Lead Plaintiff shall have 60 days from the date of the filing of Defendants’ motion to file an opposition, and Defendants shall have 45 days from the date of the filing of Plaintiff’s opposition to file a reply.

¹ Defendants have not seen the proposed SAC. Accordingly, while Defendants agree that Plaintiff may file its SAC, Defendants reserve all other rights, including as to any argument by Lead Plaintiff that new allegations in the SAC arise out of and/or relate to the allegations in the CCAC.

1 DATED: November 21, 2018
2
3
4
5
6
7
8

/s/ Thomas A. Dubbs
Thomas A. Dubbs (*pro hac vice*)
Louis Gottlieb (*pro hac vice*)
Jeffrey A. Dubbin (#287199)
Carol C. Villegas (*pro hac vice*)
James L. Ostaszewski (*pro hac vice*)
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
tdubbs@labaton.com
lgottlieb@labaton.com
cvillegas@labaton.com
jdubbin@labaton.com
jostaszewski@labaton.com

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

*Counsel for Lead Plaintiff the Public
Employees Retirement Association of New
Mexico*

KERR & WAGSTAFFE LLP
JAMES M. WAGSTAFFE (#95535)
FRANK BUSCH (#258288)
101 Mission Street, 18th Floor
San Francisco, California 94105
Telephone: (415) 371-8500
Facsimile: (415) 371-0500
Email: wagstaffe@kerrwagstaffe.com
busch@kerrwagstaffe.com

Liaison Counsel for the Class

/s/ Robert W. Perrin
ROBERT W. PERRIN (#194485)
MICHAEL J. REISS (#275021)
LATHAM & WATKINS LLP
355 South Grand Avenue, Suite
100 Los Angeles, CA 90071
Telephone: (213) 485-1234
Facsimile: (213) 891-8763
robert.perrin@lw.com
michael.reiss@lw.com

LATHAM & WATKINS LLP
JAMES E. BRANDT (*pro hac vice*)
885 Third Avenue New York, NY 10022
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
james.brandt@lw.com

Attorneys for the Company

/s/ Charles E. Weir

CHARLES E. WEIR (#211091)
GREGORY R. JONES (#229858)
JASON D. STRABO (#246426)
McDERMOTT WILL & EMERY LLP
2049 Century Park East, Suite 3800
Los Angeles, CA 90067-3218
Telephone: (310) 277-4110
Facsimile: (310) 277-4730
PG&E@mwe.com

McDERMOTT WILL & EMERY LLP
STEVEN S. SCHOLES (*pro hac vice*)
444 West Lake Street
Chicago, IL 60606-0029
Telephone: (312) 372-2000
Facsimile: (310) 984-7700
PG&E@mwe.com

Attorneys for the Individual Defendants

